

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ERB LEGAL INVESTMENTS, LLC,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:20-cv-1255-DDN
)	
QUINTESSA, LLC, et al.)	
)	
Defendants.)	

DEFENDANT QUINTESSA LLC'S PROPOSED ORDER

The Court takes up Plaintiff's Motion to Compel [Doc.#55]. Prior to the Motion to Compel, the parties met and conferred and resolved most disputes. The Court heard argument on the remaining issues and orders as follows:

INTERROGATORIES:

- 1(m): The Court sustains Plaintiff's request to compel but limits the relevant time period to entities that perform marketing services for lawyers and/or law firms as of the date the subject contract was entered into (4-20-20) to present.
- 3: Quintessa agrees to supplement.
- 4: The Court sustains Plaintiff's motion and orders Defendant to answer as to any employees who spoke with the leads that Quintessa sent to ERB.
- 8: Quintessa agrees to supplement.
- 11(a): Quintessa agrees to supplement.
- 11(c): Quintessa agrees to supplement.
- 11(d): Quintessa agrees to supplement.
- 11(f): Quintessa agrees to supplement.
- 11(g): Quintessa agrees to supplement.
- 11(j): Quintessa agrees to supplement.
- 11(k): Quintessa agrees to supplement.
- 11(l): Quintessa agrees to supplement.
- 11(m): Quintessa agrees to supplement.
- 11(n): Quintessa agrees to supplement.
- 11(o): Quintessa agrees to supplement.
- 12: Quintessa agrees to supplement.

15. After hearing argument of counsel, the Court initially sustained Plaintiff's motion but limited the relevant period to any time a business relationship began between Defendant and any third party, individual or entity from January 1, 2015 to present. Counsel for Defendant requested briefing on this, which the Court permitted. The Court orders Plaintiff and Defendant to meet and confer again on this interrogatory. If an agreement cannot be reached, then Plaintiff is ordered to file a new motion to compel and Defendant can file a response.

16. Quintessa agrees to supplement.

17(b): Quintessa agrees to supplement.

17(c): Quintessa agrees to supplement.

18: The Court denies Plaintiff's motion to compel without prejudice.

19: The Court sustains Plaintiff's motion to compel as to subparts as to (a)-(f), with the limitations contained in 1(m), and subject to any agreement of counsel or further court order as to Interrogatory #15, but overrules (g)-(j).

20: The Court sustains Plaintiff's motion to compel as to subparts as to (a)-(f), with the limitations contained in 1(m), and subject to any agreement of counsel or further court order as to Interrogatory #15, but overrules (g)-(j).

REQUESTS FOR PRODUCTION:

3: Quintessa agrees to supplement.

4: The Court sustains Plaintiff's motion to compel to the same extent as the corresponding Interrogatory #4 (individuals that could be witnesses).

7: Quintessa agrees to supplement.

9: After hearing argument of counsel, the Court reserved ruling on this Request pending further briefing by the parties.

10: Quintessa agrees to supplement.

11: Quintessa agrees to provide a privilege log.

12: The Court denies Plaintiff's motion to compel without prejudice.

14: Quintessa agrees to supplement.

15: Quintessa agrees to provide a privilege log.

16: Quintessa agrees to provide a privilege log.

17: Quintessa agrees to provide a privilege log.

18: Quintessa agrees to provide a privilege log.

19: Quintessa agrees to provide a privilege log.

23: Quintessa agrees to supplement with (a) document(s) that identify employees.

24: The Court orders briefing on this Request for Production in a newly filed motion to compel if the parties cannot reach an agreement thereon.

25: The Court orders briefing on this Request for Production in a newly filed motion to compel if the parties cannot reach an agreement thereon.

26: The Court denies Plaintiff's motion to compel on this Request but orders Quintessa to answer the corresponding interrogatory.

27: The Court denies Plaintiff's motion to compel on this Request but orders Quintessa to answer the corresponding interrogatory.

28: The Court orders the parties to meet and confer on this request.

29: The Court orders the parties to meet and confer on this request.
30: The Court orders the parties to meet and confer on this request.
31: The Court orders the parties to meet and confer on this request.
32: The Court orders the parties to meet and confer on this request.
33: The Court orders the parties to meet and confer on this request.
36: Quintessa agrees to supplement.

The Court Orders Quintessa to provide supplemental answers in accordance with this
Order by August 6, 2021.

Dated this ____ day of July, 2021.

DAVID D. NOCE
UNITED STATES MAGISTRATE JUDGE